



California
Department of
Health Services

SANDRA SHEWRY
Director

State of California—Health and Human Services Agency
Department of Health Services



ARNOLD SCHWARZENEGGER
Governor

December 11, 2006

TO: LIMITED PERMIT X-RAY TECHNICIANS

SUBJECT: USE OF DIGITAL X-RAY EQUIPMENT BY LIMITED PERMIT X-RAY
TECHNICIANS

Recently, Governor Schwarzenegger signed Senate Bill (SB) 1670, which affects the use of digital X-ray equipment by X-ray Technicians (XTs). This letter describes the implications of this new law and also the implementation plan by the California Department of Health Services (CDHS).

SB 1670, which takes effect January 1, 2007, requires CDHS, in part, to provide that an XT holding a limited permit in any of the following categories may perform digital radiography within his or her respective scopes of practice after completion of 20 hours or more of instruction in digital radiologic technology approved by CDHS.

- Chest radiography
- Gastrointestinal radiography
- Leg-podiatric radiography
- Torso-skeletal radiography
- Extremities radiography
- Genitourinary radiography
- Skull radiography

XTs holding a limited permit in the categories of Dental Laboratory Radiography or X-ray Bone Densitometry are not affected as they are already authorized to use digital X-ray equipment within their respective scopes of practice.

A major component in implementing SB 1670 is establishing the curricula of instruction in digital radiologic technology that must be approved by CDHS. In reviewing curricula taught by radiologic technology schools and education providers throughout the nation, it has been noted that there is wide variation and inconsistency in the topics taught. Thus, evaluation of curricula on a case-by-case basis would introduce inconsistent reviewer decision making, resulting in some individuals completing limited training or while others complete extensive training, since there is no generally agreed upon standard. Therefore, CDHS is legally required to develop a standard of instruction that is applicable to all XTs. This process can only take place through the development and

adoption of state regulations. The public's participation is encouraged via the authority granted in the Administrative Procedures Act that guarantees the public's right of due process in this rulemaking development phase.

Therefore, to comply with SB 1670 and to further ensure the uniform application of this law and its intent to the regulated communities and their right of participation in the rulemaking process, CDHS' Radiologic Health Branch (RHB) is developing the regulations and justifications needed for the rulemaking process.

When the proposed regulations are published, a notice of this rulemaking will be sent to your address currently on file. That notice will provide information on how to participate in the proposed rulemaking and will be sent to every individual holding a limited permit regardless of category, to every approved school for radiologic technologists, which includes limited permit X-ray technician schools, and to those persons who have already requested notification of rulemaking.

If you have moved within the last 30 days, you must notify us of the change by submitting a change of name or address form found at www.dhs.ca.gov/rhb under "applications/forms" and selecting "Certification Name/Address Change Request Form."

Until the regulations are approved by the Office of Administrative Law and filed with the Secretary of State, XTs will be unable to use digital X-ray equipment.

This notice and information regarding rulemaking are posted at www.dhs.ca.gov/rhb under Hot Topics. We will periodically post status development updates on our website, so please check often for updates.

To obtain a copy of this bill go to: <http://www.leginfo.ca.gov/statute.html>, enter "537" for Chapter, and "2006" for Chapter Year. "

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Butner".

Gary Butner
Acting Chief
Radiologic Health Branch